



The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
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Circular Letter: DHCQ 10-12-541

TO: Chief Executive Officers, Massachusetts Acute Care Hospitals

FROM: John Auerbach, Commissioner  
Massachusetts Department of Public Health  
Alice F. Bonner, PhD, RN  
Director, Bureau of Health Care Safety and Quality  
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Medical Director and State Epidemiologist, Bureau of Infectious Diseases

DATE: December 6, 2010

RE: Condition of Licensure: Immunization of Healthcare Personnel Against Influenza

As a condition of licensure, Massachusetts Department of Public Health (MDPH) regulations mandate all licensed health care facilities to offer, free-of charge, annual influenza vaccine to all personnel (regular employees, contracted employees, volunteers, house staff or students); document receipt of influenza vaccine administered within and outside the facility; or document the declination of immunization.<sup>1</sup>

The intention of this regulation is to advance patient safety by reducing the spread of influenza and to protect the health of both patients and health care workers. The goal of this policy is to achieve healthcare personnel influenza vaccination coverage of 100% of those who do not have a medical contraindication.

Enclosed with this memorandum, you will find information on influenza vaccination rates of healthcare personnel in acute care hospitals in Massachusetts, as reported by those hospitals for 2009-2010. Attachment 1 includes your hospital's overall percentage of vaccination coverage and provides aggregate group comparisons. While some hospitals did quite well, inadequate progress has been made in achieving the goal of 100% coverage. Although it is appreciated that 2009-2010 was an extraordinary year in terms of the 2009 H1N1 pandemic and seasonal vaccine supply, and that the methodology used to calculate rates was suboptimal and was revised for 2010-2011, rates that place patients and healthcare personnel at risk are unacceptable. We also recognize that hospitals have taken important steps to comply with the new regulations in spite of some opposition to the policy.

In our ongoing commitment to promote transparency and accountability, the Department will continue to publicly post the results of individual healthcare facilities' efforts in providing influenza coverage for healthcare personnel annually on our website. Compliance with this regulatory requirement will also be assessed during the infection prevention focused surveys currently conducted by the Department.

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<sup>1</sup> 105 CMR 130.325, 105 CMR 140.150, 105 CMR 150.002(D)(8) available at [www.mass.gov/dph](http://www.mass.gov/dph).

We suggest your results be shared internally with all staff, your Board of Directors and Patient and Family Advisory Council. Prevention of influenza by promoting vaccination must be an organizational priority and part of the overall institutional commitment to improvement. The successful implementation of strategies to ensure compliance is dependent on clear administrative policies and committed executive leadership.

Many resources are available to help health care facilities develop influenza campaigns and identify best practices for increasing healthcare personnel vaccination rates. The following non-inclusive list is provided:

- The Employee Flu Immunization Campaign Kit designed by MassPRO in collaboration with the Massachusetts Medical Society to help hospitals, nursing homes, and other health care settings protect staff and patients from influenza by increasing health care worker immunization rates. It is available at: [www.massmed.org/flu\\_kit](http://www.massmed.org/flu_kit)
- December 14, 2010, 12:00 to 1:30 PM, MassPRO will host a webinar on improving influenza immunization rates in healthcare personnel. For more information please contact Sharon Reidbord at [sreidbord@masspro.org](mailto:sreidbord@masspro.org) or 781-419-2788.
- Recommendations of the Healthcare Infection Control Practices Advisory Committee (HICPAC) and the Advisory Committee on Immunization Practices (ACIP) for vaccinating healthcare workers against influenza are available at: <http://www.cdc.gov/mmwr/PDF/rr/rr5502.pdf>
- The Joint Commission monograph entitled *Providing a Safer Environment for Health Care Personnel and Patients Through Influenza Vaccination* available at: [http://www.jointcommission.org/NR/rdonlyres/814E02F2-1E1C-4D76-9043-DBB3E12A205A/0/Flu\\_Monograph.pdf](http://www.jointcommission.org/NR/rdonlyres/814E02F2-1E1C-4D76-9043-DBB3E12A205A/0/Flu_Monograph.pdf)
- *Improving Influenza Vaccination Rates in Health Care Workers Strategies to Increase Protection for Workers and Patients* is available from the National Foundation for Infectious Diseases at: <http://www.nfid.org/pdf/publications/hcwmonograph.pdf>
- The Association for Professionals in Infection Control and Epidemiology provides a toolkit at: [http://www.apic.org/Content/NavigationMenu/PracticeGuidance/Topics/Influenza/toolkit\\_contents.htm](http://www.apic.org/Content/NavigationMenu/PracticeGuidance/Topics/Influenza/toolkit_contents.htm)
- The National Influenza Vaccine Summit website with information on best practices for maximizing influenza vaccination rates among healthcare workers at: [http://www.preventinfluenza.org/profs\\_workers.asp](http://www.preventinfluenza.org/profs_workers.asp)
- The Massachusetts Hospital Association (MHA) is available to provide education and support on best practices.

Seasonal influenza vaccination is an effective method of preventing influenza virus infection and its potentially serious complications. The Department is committed to working with you to ensure that patients and personnel are protected. Thank you for your ongoing participation in this important initiative.

## ATTACHMENT 1

Figure 1 displays aggregate results reported by Massachusetts acute care hospitals during the 2009-2010 influenza season (n=71), your hospital's total percent vaccinated and categorizes your hospital's performance for this reporting period. Two measures of vaccine coverage are included 1) receipt of doses of seasonal influenza vaccine administered by the hospital and 2) receipt of doses of seasonal influenza vaccine administered outside of the hospital. Vaccination coverage with influenza A (H1N1) 2009 monovalent vaccine is not represented in this data.

**Top 10%** - In general, the hospitals represented in the top 10% have achieved  $\geq 83\%$  vaccination coverage for healthcare personnel. If your hospital has achieved this level of success, we commend your ongoing efforts to reach the goal of 100% coverage and suggest you share your implementation strategy broadly. Hospitals in this category include:

- Athol Memorial Hospital
- Fairview Hospital
- Lawrence General Hospital
- Milton Hospital
- Sturdy Memorial Hospital
- Saint Vincent Hospital

**Middle 80%** - In general, the hospitals represented in the middle 80% have achieved between 54% to 82% vaccination coverage for healthcare personnel. Please use this data to assess overall progress toward vaccination goal. Identify factors necessary to raise seasonal influenza vaccination rates and incorporate evidence-based interventions in your program.

**Bottom 10%** - In general, the hospitals represented in the bottom 10% have less than 54% vaccination coverage for healthcare personnel. *We strongly encourage you to disseminate this actionable data internally to all staff and additional members of your leadership team including the Board of Directors and Patient and Family Advisory Council.* Strategies for ensuring compliance should be reviewed to identify barriers to implementation of influenza prevention programs. Successful programs require committed leadership that considers the level of vaccination among healthcare personnel to be an important measure of patient safety and quality; ready access to vaccination at no charge; targeted education emphasizing the rationale for the policy and adequate resources.

### Influenza Vaccination Rates of Healthcare Personnel in MA Hospitals by Category 2009-2010

| Top 10%     | Middle 80% | Bottom 10% | Your Hospital's<br>Total Percent<br>Vaccinated | Your Hospital's<br>Category |
|-------------|------------|------------|--|-----------------------------|
| $\geq 83\%$ | 54% to 82% | $<54\%$    |  |                             |

**Figure 1.**

The complete *Hospital Personnel Seasonal Influenza Vaccination Report 2009-2010* is available by clicking the following link.

[http://www.mass.gov/Eeohhs2/docs/dph/quality/healthcare/hai\\_influenza\\_vaccination\\_report.pdf](http://www.mass.gov/Eeohhs2/docs/dph/quality/healthcare/hai_influenza_vaccination_report.pdf)